

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:23-cr-00240-SI

v.

INDICTMENT

PAUL MARTINEZ, JR., and  
VANESSA RENAE PLAZOLA

Defendants.

18 U.S.C. §§ 1113, 1152  
18 U.S.C. §§ 113(a)(3), 1152, 1153  
18 U.S.C. §§ 113(a)(6), 1152, 1153  
18 U.S.C. § 924(c)(1)(a)  
18 U.S.C. § 2

Forfeiture Allegation

THE GRAND JURY CHARGES:

COUNT 1

(Attempted Murder)  
(18 U.S.C. §§ 1113 and 1152)

On or about June 27, 2023, on the Warm Springs Indian Reservation, in Indian Country, and within the District of Oregon, defendant **PAUL MARTINEZ, JR.**, willfully, deliberately, maliciously, and with premeditation and malice aforethought, did attempt to kill Adult Victim 1 (AV1), an Indian, by shooting AV1 with a firearm;

In violation of Title 18, United States Code, Sections 1113 and 1152.

COUNT 2

(Assault with a Dangerous Weapon)  
(18 U.S.C. §§ 113(a)(3) and 1152)

On or about June 27, 2023, on the Warm Springs Indian Reservation, in Indian Country, and within the District of Oregon, defendant **PAUL MARTINEZ, JR.**, intentionally assaulted

AV1, an Indian male, with a dangerous weapon, to wit: a firearm, with the intent to do bodily harm;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1152.

**COUNT 3**

**(Assault Resulting in Serious Bodily Injury)  
(18 U.S.C. §§ 113(a)(6), 1152, and 2)**

On or about June 27, 2023, on the Warm Springs Indian Reservation, in Indian Country, and within the District of Oregon, defendants **PAUL MARTINEZ, JR.**, and **VANESSA RENAE PLAZOLA** did recklessly and intentionally assault and aid abet each other in assaulting AV1, an Indian male, with said assault resulting in serious bodily injury to AV1;

In violation of Title 18, United States Code, Sections 113(a)(6), 1152, and 2.

**COUNT 4**

**(Possession of a Firearm in Furtherance of a Crime of Violence)  
(18 U.S.C. § 924(c)(1)(A)(i))**

On or about June 27, 2023, in the District of Oregon, defendant **PAUL MARTINEZ, JR.** unlawfully and knowingly carried, used, brandished and discharged a firearm, namely a black pistol, during and in relation to a crime of violence that may be prosecuted in a court in the United States, that is: Attempted Murder in violation of 18 U.S.C. § 1113, as alleged in Count 1, and Assault with a Dangerous Weapon in violation of 18 U.S.C. § 113(a)(3), as alleged in Count 2.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

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**COUNT 5**  
**(Assault with a Dangerous Weapon)**  
**(18 U.S.C. §§ 113(a)(3) and 1153)**

On or about June 27, 2023, on the Warm Springs Indian Reservation, in Indian Country, and within the District of Oregon, defendant **VANESSA RENAE PLAZOLA**, an Indian female, intentionally assaulted Adult Victim 2 (AV2) with a dangerous weapon, to wit: a piece of wood, with the intent to do bodily harm;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1153.

**COUNT 6**  
**(Assault Resulting in Serious Bodily Injury)**  
**(18 U.S.C. §§ 113(a)(6) and 1153)**

On or about June 27, 2023, on the Warm Springs Indian Reservation, in Indian Country and within the District of Oregon, defendant **VANESSA RENAE PLAZOLA**, an Indian female, did recklessly and intentionally assault AV2, with said assault resulting in serious bodily injury to AV2;

In violation of Title 18, United States Code, Sections 113(a)(6) and 1153.

**FORFEITURE ALLEGATION**

Upon conviction of the offense alleged in Count 4, defendant **PAUL MARTINEZ, JR.** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and

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Title 28, United States Code, Section 2461(c), the firearm involved in that offense, namely a black pistol, along with all magazines, ammunition, and accessories therefor.

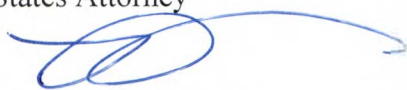
Dated: July 18, 2023.

A TRUE BILL

OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT  
United States Attorney



PAMELA PAASO, TXSB #24060371  
Assistant United States Attorney